

**BellSouth Telecommunications, Inc.**

**Legal Department**

1600 Williams Street

Suite 5200

Columbia, SC 29201

patrick.turner@bellsouth.com

**Patrick W. Turner**

General Counsel-South Carolina

803 401 2900

Fax 803 254 1731

March 16, 2004

The Honorable Bruce Duke  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Analysis of Continued Availability of Unbundled Local Switching for  
Mass Market Customers Pursuant to the Federal Communication  
Commission's Triennial Review Order  
(Docket No. 2003-326-C)

Dear Mr. Duke:

Enclosed for filing are the original and ten copies of BellSouth Telecommunications, Inc.'s First Requests for Admissions, Second Set of Interrogatories, and Second Requests for Production of Documents to MCImetro Transmission Services, LLC, MCI WorldCom Communications, Inc. and MCI WorldCom Network Services, Inc. (collectively "MCI") in the above-referenced matter.

By copy of this letter, I am serving this discovery on all parties of record as reflected by the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml

Enclosures

PC Docs # 531143

cc: Parties of Record

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2003-326-C**

IN RE:

Analysis of Continued Availability of Unbundled )  
Local Switching for Mass Market Customers )  
Pursuant to the Federal Communication )  
Commission's Triennial Review Order )  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUESTS FOR  
ADMISSIONS, SECOND SET OF INTERROGATORIES, AND SECOND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO MCIMETRO TRANSMISSION SERVICES,  
LLC, MCI WORLDCOM COMMUNICATIONS, INC. AND MCI WORLDCOM  
NETWORK SERVICES, INC.**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to S.C. Code Ann. Regs. 103-851 and Order No. 2003-667, issued in this docket on November 7, 2003, hereby serves its First Requests for Admissions, Second Set of Interrogatories, and Second Request for Production of Documents to MCI WorldCom Communications, Inc. and MCIMetro Access Transmission Services, LLC (collectively "MCI").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its subsidiaries, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to MCI.
3. MCI means MCI WorldCom Communications, Inc., MCIMetro Access Transmission Services, LLC, and their subsidiaries, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of MCI.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of MCI, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope

of these discovery requests any information that would otherwise not be brought within their scope.

9. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

10. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

11. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

12. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;

- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

13. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

14. "Hot cut" refers to the entire process necessary to physically transfer from one carrier to another a working voice grade line or working voice grade loop that remains working after the transfer.

15. “Batch Hot Cut” should be defined consistent with the FCC’s use of that term, unless the Interrogatory provides another definition.

16. “Individual Hot Cut” refers to all hot cuts that are not batch hot cuts.

17. “Business case” refers to any undertaking that analyzes or evaluates, among other things, the business value to be realized, the tangible and intangible benefits, the effect on business processes and people's jobs, the financials, the technology to be applied, and the risks, potential problems and rewards of a particular course of action. It is the process that would be undertaken prior to going into a particular business, or before undertaking a particular course of action in order to determine whether the actions taken would provide a positive business benefit, when balanced against the potential problems that might be incurred.

18. “Line” refers to a transmission path between user terminal equipment and a switching center that is used to provide local exchange service.

19. “ILEC” refers to Incumbent Local Exchange Carrier.

20. “DSO” refers to Digital Signal, level zero.

21. “DS1” refers to Digital Signal, level 1.

22. “FCC” refers to the Federal Communications Commission.

23. “UNE” refers to Unbundled Network Element.

24. “UNE-L” refers to Unbundled Network Element-Loop.

25. “UNE-P” refers to Unbundled Network Element –Platform.

26. “MSA” refers to Metropolitan Statistical Area.

27. “Voice-grade equivalent lines” should be defined consistent with the FCC’s use of the term, unless the Interrogatory provides another definition.

28. “Churn” refers to the average monthly outward movement of end user customers expressed as a percentage of total end user customers in service.

### **GENERAL INSTRUCTIONS**

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent MCI has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in South Carolina or any other state in proceedings in which BellSouth and MCI are parties, MCI need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

### **REQUESTS FOR ADMISSIONS AND INTERROGATORIES**

112. Referring to page 5 of the Direct Testimony of Mark T. Bryant, is it Dr. Bryant's opinion that economic theory supports the view that monopoly in one market permits a rational firm, in equilibrium, to "leverage" its monopoly into another market? If so, please identify all documents, including, but not limited to, economic treatises, articles, or other literature that support his opinion.

113. Referring to page 6 of the Direct Testimony of Mark T. Bryant, please admit that Paragraph 213 of the FCC's Triennial Review Order provides that certain features or capabilities of hybrid loops must be unbundled.

114. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

115. Describe with particularity each MCI service or product offering that it would be technically feasible for MCI to provide to mass market customers using the features or capabilities of hybrid loops that must be unbundled pursuant to Paragraph 213 of the FCC's Triennial Review Order.



116. Describe with particularity each MCI service or product offering that it would be technically infeasible for MCI to provide to mass market customers because of a lack of access to the features or capabilities of hybrid loops that are not required to be unbundled pursuant to Paragraph 213 of the FCC's Triennial Review Order.

117. Referring to the statements on page 12 of the Direct Testimony of Mark T. Bryant concerning the possibility of a market being defined to include Columbia and Barnwell, in Dr. Bryant's opinion, what are the smallest and largest definitions of a geographic market that the Public Service Commission of South Carolina could adopt consistent with the FCC's Triennial Review Order and accepted economic principles? In answering this Interrogatory, provide specific references to the FCC's Triennial Review Order and identify all documents, including, but not limited to, economic treatises, articles, or other literature that support his opinion.

118. Referring to page 14 of the Direct Testimony of Mark T. Bryant, provide all references to the FCC's Triennial Review Order that support the claim that a trigger analysis requires a finding that "the CLECs serve a sufficient number of customers in the market."

119. Referring to the statement on page 16 of the Direct Testimony of Mark T. Bryant, explain with specificity why "the customer's only option will be to switch back to the ILEC" in the event a finding of non-impairment by the Public Service Commission of South Carolina is "incorrect." In answering this Interrogatory, please address whether a customer who receives voice service from a UNE-P CLEC that decides to discontinue providing such service would have the option of switching to a UNE-L CLEC.

120. Referring to page 16 of the Direct Testimony of Mark T. Bryant, please explain with specificity precisely how Dr. Bryant's analysis would change if he were to incorporate "the risk and cost in overcoming these barriers" that he considers appropriate.

121. Referring to pages 11 through 17 of the Direct Testimony of Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf, or at the direction of either MCI or Dr. Bryant concerning the extent to which the triggers have been satisfied in any given market in South Carolina? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation.

122. Referring to page 17 of the Direct Testimony of Mark T. Bryant, describe with particularity each “existing barrier to entry” that you expect will “diminish in importance” with the passage of time. In answering this Interrogatory, please:

- (a) explain with specificity why the passage of time will cause each such alleged entry barrier to diminish in importance;
- (b) provide your best estimate of the length of time that must pass before each such alleged entry barrier will diminish in importance;
- (c) explain with specificity how each alleged entry barrier that Dr. Bryant expects will diminish in importance with the passage of time was incorporated into Dr. Bryant’s impairment analysis;
- (d) identify those alleged entry barriers that, in Dr. Bryant’s opinion, make unbundled switching essential for competitive entry for the foreseeable future; and
- (e) identify all documents that support Dr. Bryant’s opinions.

123. Referring to pages 20-21 of the Direct Testimony of Mark T. Bryant concerning his expectation that “more CLECs [would] self-provision switching in the relatively near future” if “CLECs are not impaired without access to UNE switching,” identify each geographic market in South Carolina from which MCI intends to withdraw if the Public Service Commission of

South Carolina makes a no impairment finding. In answering this Interrogatory, identify all documents created by or on behalf of MCI that would justify its withdrawal from such markets.

124. Referring to page 24 of the Direct Testimony of Mark T. Bryant, identify all studies, documents, analyses, or work papers that support Dr. Bryant's claim that "price competition had driven wholesale prices well below historic/embedded costs" in the long distance wholesale market. In answering this Interrogatory, explain exactly what time period Dr. Bryant is referring to.

125. Referring to page 28 of the Direct Testimony of Mark T. Bryant, state all facts and identify all documents that support Dr. Bryant's claim that there in fact are significant variations in "locations of customers actually being served," "costs between wire centers," "capability to provide collocation space," and/or "the ability of wire centers to handle large numbers of hot cuts," between wire centers within the same UNE rate zone and same CEA.

126. State all facts and identify all documents that support the statement on page 30 of the Direct Testimony of Mark T. Bryant that "the costs of providing service vary widely from one wire center to another ...." In answering this Interrogatory, describe with particularity each category of cost that you claim varies from wire center to wire center.

127. Referring to page 30 through 34 of the Direct Testimony of Mark T. Bryant, please admit that MCI's local switches in South Carolina serve a geographic area comparable to or even larger than the geographic areas served by BellSouth's local tandems in South Carolina.

128. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

129. Referring to pages 33 and 34 of the Direct Testimony of Mark T. Bryant, please admit that if a geographic market is defined too narrowly the Public Service Commission of

South Carolina may end up finding impairment in areas of which competitors are in fact not impaired without access to unbundled local switching.

130. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

131. Referring to pages 35 -37 of the Direct Testimony of Mark T. Bryant, identify each administrative, regulatory, judicial, or other proceeding in which Dr. Bryant has participated in which he has performed market definition analysis under the HMG. In answering this Interrogatory,

- (a) provide the case number of each such proceeding; and
- (b) state the date when the proceeding was initiated and the date when Dr. Bryant performed market definition under the HMG.

132. Referring to page 36 of the Direct Testimony of Mark T. Bryant, has Dr. Bryant performed an analysis using the “small but significant and nontransitory price increase” methodology to determine the proper geographic market in this case? Unless the answer to this Interrogatory is an unqualified no, please identify all analyses and work papers documenting any such study.

133. Referring to page 36 of the Direct Testimony of Mark T. Bryant, has Dr. Bryant performed an analysis using the “small but significant and nontransitory price increase” methodology to determine the proper product market in this case? Unless the answer to this Interrogatory is an unqualified no, please identify all analyses and work papers documenting any such study.

134. Referring to page 45 of the Direct Testimony of Mark T. Bryant, please admit that there are circumstances when a CLEC can self-provision local switching without being collocated at each wire center the CLEC intends to serve.

135. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

136. Referring to page 46 of the Direct Testimony of Mark T. Bryant, please explain why the detail of information referenced on a wire center level cannot be accurately interpreted when aggregated on a higher level to combine several wire centers. In answering this Interrogatory, please explain why Dr. Bryant believes that a rational contiguous grouping of wire centers that produce an expected positive net revenue to cover the cost of capital does not constitute an appropriate definition of a market.

137. Referring to page 47 of the Direct Testimony of Mark T. Bryant, state all facts and identify all documents that support Dr. Bryant's claim that CLEC market entry decisions are made on the wire center level.

138. For each wire center in BellSouth's service territory in South Carolina, please provide, the date when MCI first began offering local exchange service in each such wire center.

139. How does MCI define a "small" business customer as referenced on pages 51 and 52 of the Direct Testimony of Mark T. Bryant?

140. Based on the foregoing definition, and referring to pages 51 and 52 of the Direct Testimony of Mark T. Bryant,

- (a) describe with particularity each difference between "small" business customers and residential customers that you contend creates "differences" in the ability of a CLEC to serve such customers;

- (b) describe with particularity each “difference” that you contend exists with respect to the ability of a CLEC to serve “small” business customers and residential customers; and
- (c) identify all documents referring or relating to such differences.

141. Referring to the discussion of revenues at pages 79 through 80 of the Direct Testimony of Mark T. Bryant, did Dr. Bryant consider the effect on revenues of potential new services that the CLEC might offer? Unless the answer to this Interrogatory is an unqualified no, please provide all work papers and analyses related to such a consideration, and explain which, if any, revenues were included in the model to reflect new services.

142. Referring to page 82 of the Direct Testimony of Mark T. Bryant, identify all documents, including, but not limited to, economic treatises, articles, or other literature that support Dr. Bryant’s opinion that “the incumbent does not need to set prices at predatory levels to deter future entry.”

143. Referring to page 84 of the Direct Testimony of Mark T. Bryant, identify all models, studies, analyses, and work papers that support Dr. Bryant’s opinion that prices “would decline somewhere in the range of 11% to 20% over the course of time following entry by UNE-L based CLECs.” In answering this Interrogatory, please explain if these are real or nominal price changes, and whether Dr. Bryant’s analysis incorporates expected inflation.

144. Referring to page 84 of the Direct Testimony of Mark T. Bryant, please explain how, if at all, Dr. Bryant’s claim that prices “would decline somewhere in the range of 11% to 20% over the course of time following entry by UNE-L based CLECs” is reflected in his impairment model.

145. Referring to page 84 of the Direct Testimony of Mark T. Bryant, please identify all models, studies, analysis, and work papers that support Dr. Bryant's opinion that the "some of the price decline should happen very quickly, with continued declines occurring over time."

146. Regarding the net revenue analysis discussed in the Direct Testimony of Mark T. Bryant, please admit that a company's business plan can have negative net revenue in the early years and nevertheless have a positive NPV (net present value) over a specified period of time.

147. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

148. Regarding statements in the Direct Testimony of Mark T. Bryant regarding the impairment model, please provide Dr. Bryant's or MCI's definition of "mass market" and identify all supporting analysis and work papers that support the use of this definition.

149. Please state all facts and identify all documents that support the use of the following assumptions referenced in pages 87 through 89 of the Direct Testimony of Mark T. Bryant:

- (a) 5% market share;
- (b) \$40 / month average residential revenue (before subscriber line charge);
- (c) \$54/ month average business revenue (before subscriber line charge);
- (d) 200 toll minutes per customer;
- (e) 12 month life of a CLEC customer;
- (f) \$130 customer acquisition cost; and
- (g) a hot cut cost of \$10 with a range of \$7 to \$13.

150. Regarding items (b) and (c) referenced in the foregoing Interrogatory, do these include revenues associated with international and toll-free calling?

151. Regarding the spreadsheet attached to the Direct Testimony of Mark T. Bryant, explain with particularity how the 15% weighted average cost of capital was calculated and state all facts and identify all documents that support this calculation.

152. Regarding the spreadsheet attached to the Direct Testimony of Mark T. Bryant, explain with particularity how the 5.0% uncollectible for residential retail subscribers was derived from the FCC ARMIS Report 43-01.

153. For the data contained in each wire center in the analytic tool discussed in the Direct Testimony of Mark T. Bryant, please describe with particularity how the customer data, revenues, and costs were derived. In answering this Interrogatory, state all facts and identify all documents that support the use of such data.

154. Provide a detailed comparison of the default input values contained in the analytic tool used by Dr. Bryant to the default input values contained in the model developed by Dr. Gabel.

155. For each cost and revenue assumption used in the analytic tool referenced in the Direct Testimony of Mark T. Bryant, please:

- (a) state whether Dr. Bryant relied on the value provided by Dr. Gabel or individually determined the value;
- (b) identify where the detail, the backup and justification for each cost item reflected in the analytic tool can be found; and
- (c) provide a listing of each instance in which Dr. Bryant utilized an input that differs from the comparable input of Dr. Gabel, and explain with specificity why Dr. Bryant rejected Dr. Gabel's input.



156. With respect to the use of Dr. Bryant's analytic tool, does Dr. Bryant believe that there are inherent deficiencies in using a single point analysis for net revenues instead of a time series? In answering this Interrogatory, state all facts and identify all documents that support the use of a single point analysis in this proceeding.

157. Does MCI make business decisions based on a single point estimate or based on a time series? In answering this Interrogatory, explain with specificity why MCI uses one approach rather than the other.

158. With respect to the use of Dr. Bryant's analytic tool, was a time series analysis performed by, on behalf, or at the direction of Dr. Bryant? In the answer to this Interrogatory is in the affirmative, describe the results of this time series analysis and explain with specificity how each input varied over the time horizon selected.

159. With respect to the use of Dr. Bryant's analytic tool, does this tool analyze results at a wire center level taking into account the revenues and costs that the CLEC would incur to provide service to all of its customers in the wire center? If the tool aggregates all CLEC customers at the wire center level, explain how this tool provides information that is specific to the impairment issue with respect to mass market switching in the state of South Carolina.

160. The NRRI model prepared by Dr. Gabel has a worksheet, "Telric Switching and Trans," which states that "Data in this tab is derived from: Commerce Capital Markets, The Status of 271 and UNE-Platform in the Regional Bells' Territories (November 2002) by Anna Maria Kovacs, Kristin L. Burns, and Gregory S. Vitale." With respect to Dr. Bryant's model:

- (a) does Dr. Bryant's model include the same type of information that was contained in the "Telric Switching and Trans" worksheet in Dr. Gabel's

model? If so, please identify the worksheet in which this information is contained. If not, please explain why not?

- (b) does Dr. Bryant's model include the same input values, from the "Commerce Capital Markets" document referred to above, as used by Dr. Gabel's model? If so, please state all facts and identify all documents that support the use of these input values in South Carolina. If not, please explain why not.

161. With specificity, please identify the outputs and tables in the "IAT SC PROPRIETARY 040301.xls" in the Supplemental Direct Testimony of Mark T. Bryant that Dr. Bryant believes identify and support the claim of wire centers in South Carolina where CLECs are impaired without access to unbundled switching.

162. Please describe with particularity all instructions and information necessary to run the model filed by Dr. Bryant, including, but not limited, an identification of the worksheets containing model inputs, operating procedure, and an identification of the worksheets containing outputs based on the inputs.

163. To what extent does Dr. Bryant consider each of the following variables to be positively, negatively, or not at all correlated with each other:

- (a) Market share
- (b) Customer life
- (c) Hot cut cost
- (d) Revenue Residential
- (e) Revenue Business
- (f) Customer acquisition cost.

164. Please state all facts and identify all documents that support the use of the following inputs contained on the "Inputs" worksheet of IAT SC PROPRIETARY 040301.xls:

- (a) Per line overhead cost
- (b) Long distance network cost per minute
- (c) Terminating access revenue per minute
- (d) Percent of retail revenue that is uncollectible
- (e) Outgoing long distance MOU per line
- (f) CLEC CapEX WACC
- (g) Tax rate on equity return
- (h) Other taxes on investment
- (i) Recovery periods - for each category of equipment
- (j) Maintenance factor - for each category of equipment
- (k) CLEC switching investment input, including, but not limited to investment per port, additional investment per line (also described as shared getting started costs), and Switching Markup for Land, Buildings, and other Misc Investments
- (l) Unbundled Dedicated Transport Assumptions, including, but not limited to, Fill Factors, Number of Cross Connects, Voice Grade Channels Per DS1, and Voice Grade Channels Per DS3
- (m) Collocation Inputs
- (n) Equipment Inputs
- (o) DLC Equipment Costs

- (p) Power Provisioning, including, but not limited, Number of Power Cable Racks Required, DC Power Usage, AC Power Feed and Phase (in Volts), AC Power Feed Size and Phase (In Amps), AC Power Feed Cable Length (In Feet)
- (q) Construction Related Activities
- (r) DSL Cost Inputs
- (s) Hot Cut/ Cross Connect Inputs, including, but not limited to, CLEC internal costs related to the hot cut/cross connect process.

165. Please state all facts and identify all documents that support the use of any other input to the model not listed in the foregoing Interrogatory, and describe with particularity all computations in the model, including the use of scalar factors in the model.

166. Referring to the pages 59-60 of the Direct Testimony of Mark T. Bryant, state all facts and identify all documents that support Dr. Bryant's opinion that "the switch investment inputs used in the Gabel model result in a per-line monthly cost roughly the same as the unbundled local switching rate established by this Commission."

167. Has Dr. Bryant made any effort to verify the default inputs utilized by Dr. Gabel in the original version of the NRRI model? If the answer to this Interrogatory is in the affirmative, identify all documents referring or relating to such efforts.

168. The model referenced in the Direct Testimony of Mark T. Bryant provides for input of residential revenue per line by customer segment. Average retail revenue, however, is the same for all three segments of the residential market. Please explain:

- (a) Why Dr. Bryant did not apply three different revenue assumptions since the revenues should be different in each segment?

(b) Why the model does not provide for different inputs for the high, medium and low segments of the business market?

169. Explain why the incoming long distance revenue per line for business assumed in the model referenced in the Direct Testimony of Mark T. Bryant is the same as for residence.

170. Does the assumed average revenue per line for business customers in the model include all business customers or only the small office/home office segment? State all facts and identify all documents that support this assumption.

171. Explain why the business SLC was set at the same level as residence in the model referenced in the Direct Testimony of Mark T. Bryant.

172. Explain where the revenues from carrier common line access charges are included in the model referenced in the Direct Testimony of Mark T. Bryant.

173. State whether access charge revenues for business special access circuits are included in the revenue inputs for model referenced in the Direct Testimony of Mark T. Bryant.

174. Explain why customer acquisition costs for residence and business customers are assumed to be equal in the model referenced in the Direct Testimony of Mark T. Bryant.

175. Is the mix of services provided to residence and business customers (other than DSL) the same in the model referenced in the Direct Testimony of Mark T. Bryant? If not, how is that reflected in the model?

176. How were the locations of CLEC switches in tab VH (used to calculate mileage from each wire center) determined? Is this the complete list of CLEC switch locations? If three CLECs are assumed for every wire center, what assumptions are made regarding their locations?

177. In the formula for switching costs per line (column AN of the Summary Calcs tab), why is the "additional costs per line" marked up for land, buildings and miscellaneous investments?

178. Why were the OSS costs per line set at zero in the model (Inputs line 23)?

179. Please confirm that the heading for column CA of the Summary Calcs tab should read "Total Revenue Per Line Best Case" instead of "Average Cost per Line Best Case."

180. Please explain why two cross connects are required for each type of transport except EELs.

181. How were the DLC equipment fill factors of 94% derived. Is it reasonable to assume the same fill factor for all systems regardless of size? Is it reasonable to assume the same fill factor for the system and channel cards?

182. In the Bryant model, "Summary Calcs" worksheet, Columns I through K each reflect 1/3 of the residential lines, with the Columns labeled, respectively, "low lines," "mid lines" and "high lines." The "low lines" values are used in the calculation of columns BT through BY, while the mid and high lines values are not. Please explain why the residential lines are broken up into these three groupings and why one-third of them are used for the calculations of columns BT through BY, but the other two-thirds are not.

Those columns are:

BT	Total UNE-L Cost (EEL Transport)
BU	Total UNE-L Cost (UNE Transport)
BV	Total UNE-L Cost (Special Transport)
BW	Total Net Revenue (EEL Transport)
BX	Total Net Revenue (UNE Transport)
BY	Total Net Revenue (Special Transport)

183. Referring to page 7 of the Direct Testimony of James Webber, state all facts and identify all documents that support the contention that "overcoming the operational challenge

imposed by UNE-L will be all the more difficult because the Commission no longer has the 271 'carrot' to hold out as an incentive to garner [BellSouth's] cooperation in the resolution of technical issues."

184. Referring to pages 6-7 of the Direct Testimony of James Webber, identify all documents referring or relating to MCI's experience with BellSouth in South Carolina in which "time consuming," costly technical work-arounds "fraught with technological deficiencies" were required by BellSouth before MCI could "reach a customer served via IDLC."

185. Referring to page 15-16 of the Direct Testimony of James Webber, state all facts and identify all documents demonstrating BellSouth's specific inclusion in, or adoption of, the following statements:

- a. that "CLEC to CLEC, UNE-L based migrations would not be available via the hot cut process;"
- b. that "lines currently involved in a 'line splitting' arrangement could not be cut via the hot cut process;"
- c. that "IDLC lines may not be available for timely provisioning via the hot cut process;"
- d. that "lines to be provisioned over EELs' would not be available;" and
- e. that "requests for cuts comprised of higher line counts, in most circumstances would not be available without significant 'negotiation' and departure from existing provisioning and performance intervals."

186. Referring to page 16 of the Direct Testimony of James Webber, state all facts and identify all documents to support the statement that BellSouth's cost studies "incorporate inefficient procedures or technologies."

187. Referring to page 16 of the Direct Testimony of James Webber, state all facts and identify all documents that support the contention that BellSouth's studies "are generally defined

by duplicative work steps, exaggerated estimated work times and many other errors all tending toward non-recurring charges substantially in excess of efficiently incurred costs".

188. Referring to pages 44-45 of the Direct Testimony of James Webber, identify by date, CLLI code, and specific collocation arrangement every situation regarding which MCI contends that, "during the early stages of collocation," it "experienced significant delays before gaining access to the requested collocation arrangements."

189. Identify all specific data, facts, documents, white papers or other evidence upon which Mr. Webber bases his contention on page 18 of his Direct Testimony that "[t]oday's hot cut processes . . . can be made only marginally more efficient with system and process related improvements."

190. Has MCI conducted any analysis study or inquiry into the cost to deploy the automated hot cut alternatives proposed in Mr. Webber's South Carolina Direct Testimony? If so, identify all such studies and the costs set forth therein.

191. Referring to page 24 of the Direct Testimony of Sherry Lichtenberg, provide all data and identify all documents that support your contention that BellSouth's "manual handling of UNE-L migration tasks" for MCI in South Carolina has "often resulted in errors and delay."

192. Referring to page 24 of the Direct Testimony of Sherry Lichtenberg, state all facts and identify all documents that demonstrate, regarding UNE-L migrations, that any MCI South Carolina customer's service was "significantly affected" by any "failure" by BellSouth to exchange information with MCI" in a timely and accurate manner."

193. Referring to page 24 of the Direct Testimony of Sherry Lichtenberg, state all facts and identify all documents that support your contention that the "scalability of this [BellSouth's UNE-L migration] process to meet mass-market volumes is doubtful . . . ."



194. With respect to the proposed "distributed CSR retrieval system" discussed in the Direct Testimony of Sherry Lichtenberg at page 33, has MCI conducted any study, analysis or evaluation of the development and cost of such database? If the answer is in the affirmative, describe with particularity the results of that analysis, study or evaluation and identify all documents referring or relating to such analysis, study or evaluation.

195. State all facts and identify all documents that provide a basis for, or support the conclusion, found at pages 33-34 of the Direct Testimony of Sherry Lichtenberg, that "BellSouth should modify its CSR databases to provide access to the information it has about customers on its network as well as the information remaining after a customer leaves the network," pending the development of a distributed CSR database, as proposed by MCI.

196. Provide every example in MCI's possession that shows that BellSouth's LFACS does not contain accurate data, as discussed in the Direct Testimony of Sherry Lichtenberg at pages 34-35.

197. Identify every instance by date and circuit number in which MCI's South Carolina customers allegedly have been "put in the middle of 'finger pointing' exercises," involving BellSouth and MCI, with respect to the provisioning of UNE-L service, as discussed in the Direct Testimony of Sherry Lichtenberg at page 36.

198. Provide all evidence upon which MCI bases its contention that the timeliness of BellSouth's 911 process should be revised as discussed by Sherry Lichtenberg on pages 37-40 of her Direct Testimony.

199. Has MCI conducted any analysis, study or evaluation that supports the position taken by Sherry Lichtenberg, at page 39 of her Direct Testimony, that BellSouth should provide "an on-line tracking system similar to that provided by Verizon and proposed by SBC to provide

real time notification of order status."? If the answer is in the affirmative, describe with particularity the results of that analysis, study or evaluation and identify all documents referring or relating to such analysis, study or evaluation.

200. If MCI contends that BellSouth does not have a fully developed and implemented a Transition Batch Hot Cut Process in South Carolina, please state with specificity every step or process that MCI contends should be added to constitute a "fully developed and implemented" hot cut process.

201. Referring to page 2 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning "the effect that the cost of transport and the costs imposed by other ILEC charges" has had on CLEC decisions to provide qualifying service via the UNE-L? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

202. Referring to page 3 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the extent to which a CLEC will not use its switch to provide qualifying service in particular wire centers because of the cost of transport? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

203. Referring to page 3 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the geographic distance served by CLEC switches? If the answer to this Interrogatory

is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

204. Referring to page 4 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the extent to which a CLEC will not use its switch to provide qualifying service in particular wire centers because of the “number of addressable lines” in that wire center? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

205. Referring to page 4 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the number of addressable lines served by CLEC switches? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

206. Referring to page 4 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the extent to which a CLEC will not use its switch to provide qualifying service in particular wire centers because of the number of IDLC lines in that wire center? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

207. Referring to page 4 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation been conducted by, on behalf of, or at the direction of Dr. Bryant concerning the number of IDLC lines served by CLEC switches? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

208. Does Dr. Bryant contend that MCI makes market entry decisions at the wire center level? If the answer to this Interrogatory is in the affirmative, state all factors that MCI considers in the process of deciding whether to provide qualifying service in a particular wire center and identify all documents referring or relating to this decision-making process.

209. Admit that for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger the TRO requires, in part, that the carrier be serving mass market customers in the particular geographic market in question using its own local circuit switches.

210. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

211. Referring to pages 13 and 14 of the Rebuttal Testimony of Dr. Mark T. Bryant, admit that for the purposes of the FCC's switching impairment analysis, the TRO defines mass market customers as analog voice customers that purchase only a limited number of POTS lines and can only be served via DS0 loops.

212. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

213. Referring to page 15 of the Rebuttal Testimony of Dr. Mark T. Bryant, admit that the TRO does not expressly require that, when determining whether a competing carrier is serving mass market customers, the group of mass market customers has to include only residential customers or a combination of residential and business customers, as opposed to business customers alone.

214. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

215. Referring to page 17 of the Rebuttal Testimony of Dr. Mark T. Bryant, admit that the TRO does not expressly require that in order for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger test the carrier must be serving residential customers.

216. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

217. Referring to page 19 of the Rebuttal Testimony of Dr. Mark T. Bryant, admit that the TRO does not expressly require that in order for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger test the carrier must be providing service over all copper loops as well as IDLC loops.

218. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

219. Referring to page 41 of the Rebuttal Testimony of Dr. Mark T. Bryant, identify all documents that support or otherwise refer or relate to Dr. Bryant's assertion that the BACE model produces "occasional anomalous results."

220. Referring to page 32 of the Rebuttal Testimony of Dr. Mark T. Bryant, identify all documents that support or otherwise refer or relate to Dr. Bryant's assertion that the BACE model presents "misleading and inaccurate results."

221. Referring to page 36 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation of CLEC market share been conducted by, on behalf of, or at the direction of Dr. Bryant? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

222. Referring to page 37 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation of CLEC churn been conducted by, on behalf of, or at the direction of Dr. Bryant? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

223. Referring to pages 37 and 38 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation of CLEC customer acquisition cost been conducted by, on behalf of, or at the direction of Dr. Bryant? If the answer to this Interrogatory is in the

affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

224. Referring to page 40 of the Rebuttal Testimony of Dr. Mark T. Bryant, has any analysis, study, or evaluation of CLEC average monthly revenues from residence and business customers been conducted by, on behalf of, or at the direction of Dr. Bryant? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

225. Has MCI or anyone acting at the direction of or on behalf of MCI made runs of the BACE model? If the answer to this Interrogatory is in the affirmative, please:

- (a) Identify each person involved in making such runs of the BACE model, and, for each such person, state the number of runs of the BACE model he or she performed, and the number of hours spent in connection with performing such runs;
- (b) Provide in electronic format the BACE Scenario Input files (these are the "ScenarioName"\_Inputs.MDB files in the Scenario directory) used to make such runs of the BACE model;
- (c) For each scenario, provide all changes from the Filed BellSouth BACE scenario "BellSouth\_SC" used in such runs of the BACE model;
- (d) Provide all report files from the BACE model which MCI claims supports its position in this proceeding that CLECs are impaired without access to unbundled switching from BellSouth, including, for each such file, identifying the scenario used to prepare the file; and

- (e) Provide a description of the steps used to verify or evaluate the BACE model, if any were performed, and identify all documents referring or relating to such verification or evaluation process.

226. Does MCI contend that there are any errors or flaws in the BACE model? If the answer to this Interrogatory is in the affirmative, please state all facts and identify all documents that support this contention. In answering this Interrogatory, please:

- (a) Provide the BACE.Log file found in the root directory of the BACE model from the machine on which the error or flaw was encountered, a log or record of whether the BACE support line was called and informed, a screenshot of the error screen, and a list of the machines parameters (memory, free hard drive space, Operating system, processor type, etc.); and
- (b) If you did not currently have the BACE.Log file, please provide the memory, approximate free hard drive space at the time, operating system, and process type for the machine(s) on which any error or flaw occurred.

227. Does MCI contend that any inputs used by BellSouth to the BACE model are erroneous, flawed, or are otherwise inappropriate? If the answer to this Interrogatory is in the affirmative, please:

- (a) Identify each input value that you contend is erroneous, flawed, or inappropriate;
- (b) For each input to the BACE model you contend is erroneous, flawed or inappropriate, state all facts and identify all documents that support this contention;



- (c) Identify each input value that you contend should be used in the BACE model; and
- (d) For each input value that you contend should be used in the BACE model, state all facts and identify all documents that support this contention.

228. Referring to page 1 of the Rebuttal Testimony of Sherry Lichtenberg, state all facts and identify all documents that support her contention that “moving from UNE-P to UNE-L would involve an exponential increase in UNE-L provisioning volumes.”

229. Admit that any alleged “exponential increase in UNE-L provisioning volumes” as referenced on page 1 of the Rebuttal Testimony of Sherry Lichtenberg would be the result of MCI serving mass market customers using the UNE-L.

230. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

231. Referring to page 2 of the Rebuttal Testimony of Sherry Lichtenberg, state all facts and identify all documents that support her contention that “there would be a large increase in human errors that would cause provisioning delays, customer outages and other service problems.”

232. Quantify in numbers the size of the “large increase in human errors” referenced on page 2 of Ms. Lichtenberg’s Rebuttal Testimony.

233. Referring to page 3 of the Rebuttal Testimony of Sherry Lichtenberg, state all facts and identify all documents that support her contention that BellSouth’s systems are not scalable.

234. Describe with particularity: (a) every potential problem MCI contends could arise with respect to E911 in BellSouth’s current batch hot cut process; (b) the point in the process at

which MCI contends the alleged problem could occur; and (c) proposed solutions MCI contends would resolve each such alleged problem. In answering this Interrogatory, identify all documents referring or relating to MCI's contentions.

235. Describe with particularity: (a) every potential problem MCI contends could arise with respect to LNP in BellSouth's current batch hot cut process; (b) the point in the process at which MCI contends the alleged problem could occur; and (c) proposed solutions MCI contends would resolve each such alleged problem. In answering this Interrogatory, identify all documents referring or relating to MCI's contentions.

236. Describe with particularity: (a) every potential problem MCI contends could arise with respect to CLEC-to-CLEC migrations in BellSouth's current batch hot cut process; (b) the point in the process at which MCI contends the alleged problem could occur; and (c) proposed solutions MCI contends would resolve each such alleged problem. In answering this Interrogatory, identify all documents referring or relating to MCI's contentions.

237. Admit that in a CLEC-to-CLEC migration, the losing CLEC must provide the CFA to the winning CLEC.

238. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

239. Admit that BellSouth does not possess CLECs' CFA assignments.

240. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

241. Referring to pages 34 and 35 of the Direct Testimony of Sherry Lichtenberg, has MCI ever migrated a customer served by IDLC in the BellSouth region? If the answer to this

Interrogatory is in the affirmative, specify each such migration and the process by which service for that customer was migrated.

242. Admit that MCI has not identified a batch hot cut process anywhere in the United States that it deems acceptable.

243. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

244. Describe with specificity the process by which MCI informs its customer of the date on which the customer's service will be migrated from UNE-P to UNE-L. In answering this Interrogatory, identify all documents referring or relating to this process.

245. Describe with specificity the process by which MCI ports a local number after MCI receives the go-ahead notice from BellSouth during a migration of an end-user from UNE-P to UNE-L. In answering this Interrogatory, identify all documents referring or relating to this process.

246. Describe with specificity the interval by which MCI ports a local number after MCI receives the go-ahead notice from BellSouth during a migration of an end-user from UNE-P to UNE-L. In answering this Interrogatory, please:

- (a) Identify all documents referring or relating to this interval; and
- (b) Provide data for each month since January 1, 2002 demonstrating the average length of time by which MCI ported a local number after MCI received the go-ahead notice from BellSouth during a migration of an end-user from UNE-P to UNE-L.

247. Admit that MCI received the User Requirements for the UNE-to-UNE Bulk Migration via the BellSouth Change Control Process.

248. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

249. Referring to pages 10 and 52 of the Rebuttal Testimony of Sherry Lichtenberg, please identify the start date and end date (if applicable) of each collaborative with other ILECs to which Ms. Lichtenberg refers.

250. Referring to pages 10 and 52 of the Rebuttal Testimony of Sherry Lichtenberg, identify all documents referring or relating to each collaborative with other ILECs to which Ms. Lichtenberg refers.

251. Referring to page 11 of the Rebuttal Testimony of Sherry Lichtenberg, admit that the migration of line-split lines that she discusses (lines 1-14) applies only in situations when BellSouth owns the splitter and does not apply when the CLEC owns the splitter.

252. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

253. Admit that CLECs do not get a Firm Order Confirmation for the “batch” order in BellSouth’s UNE-to-UNE Bulk migration.

254. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

255. Referring to pages 51 and 52 of the Rebuttal Testimony of Sherry Lichtenberg, describe with specificity the process, including, but not limited to identifying each work steps, involved in developing “a true batch hot cut process” to which Ms. Lichtenberg refers.

256. Referring to pages 12 and 13 of the Rebuttal Testimony of Sherry Lichtenberg, describe with specificity the measurement definition and business rules for the specific performance measures MCI contends should be adopted in connection with this proceeding.

257. Admit that the “additional analog to digital signal conversion” referenced on page 10 of the Rebuttal Testimony of James D. Webber also would impact a BellSouth retail customer moved from IDLC to another facility.

258. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

259. Referring to page 12 of the Rebuttal Testimony of James D. Webber, identify each piece of equipment, state the cost of such piece of equipment, and state the total amount of equipment that BellSouth would need in South Carolina to deploy the “one additional option” to convert IDLC loops referenced by Mr. Webber.

260. State whether MCI contends that BellSouth has not provisioned any of MCI’s requested collocation space in the last 12 months in accordance with this Commission’s established ordering and provisioning intervals? If the answer is affirmative, please provide supporting details, information and documentation of these instances.

### **REQUESTS FOR PRODUCTION**

22. Produce all documents identified in response to BellSouth’s First Requests for Admissions and Second Set of Interrogatories.

23. Produce all published papers authored or coauthored by Dr. Mark T Bryant that pertain to monopoly power, monopoly leveraging, antitrust theory, antitrust practice, the horizontal merger guidelines, market share, market definition, investment incentives, decision theory, social welfare, pricing theory, pricing strategy, pricing forecasting, merger analysis, oligopoly theory, or any other topic referring or relating to Dr. Bryant’s testimony.

24. Produce all testimony, expert reports, affidavits, white papers, or similar documents authored or coauthored by Dr. Mark T. Bryant that pertain to monopoly power,

monopoly leveraging, antitrust theory, antitrust practice, the horizontal merger guidelines, market share, market definition, investment incentives, decision theory, social welfare, pricing theory, pricing strategy, pricing forecasting, merger analysis, oligopoly theory, or any other topic pertinent to Dr. Bryant's testimony.

25. Produce the SBC press release referenced on page 6 of the Direct Testimony of Mark T. Bryant.

26. Produce all sensitivity analyses of the impairment model referenced in the Direct Testimony of Mark T. Bryant conducted by, on behalf, or at the direction of Dr. Bryant.

27. Produce copies of all responses made by you to data requests, interrogatories, and requests for production of documents from the staff of the South Carolina Public Service Commission.

28. Produce copies of all responses made by you to data requests, interrogatories, and requests for production of documents from any other party in Docket No. 2003-326-C.

29. Produce all documents evidencing or referring or relating to any sensitivity analyses of the BACE model conducted by, on behalf of, or at the direction of MCI.

Respectfully submitted, this \_\_\_\_th day of March 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



Patrick W. Turner  
1600 Williams Street, Suite 5200  
Columbia, South Carolina 29201  
(803) 401-2900

R. Douglas Lackey  
Meredith E. Mays  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0747

ATTORNEYS FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

531078





Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(Electronic Mail)**

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, South Carolina 29201  
(AT&T Communications of the Southern States, LLC)  
(NuVox Communications, Inc.)  
(Xspedius)  
(NewSouth Communications, Corp.)  
**(Electronic Mail)**

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte  
1310 Gadsden Street  
Columbia, South Carolina 29211  
(Competitive Carriers of the South, Inc.)  
(ITC^DeltaCom Communications, Inc.)  
**(Electronic Mail)**

Nanette S. Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
**(Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Communications, Inc.)  
(Intermedia Communications, Inc.)  
(MCImetro Access Transmission Services, LLC)  
**(Electronic Mail)**

Kennard B. Woods, Esquire  
MCI  
Law and Public Policy  
6 Concourse Parkway, Suite 600  
Atlanta, Georgia 30328  
**(Electronic Mail)**

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(SCTC)  
**(Electronic Mail)**

Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(Electronic Mail)**

H. Edwards Phillips, III, Esquire  
Legal Department Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(Electronic Mail)**

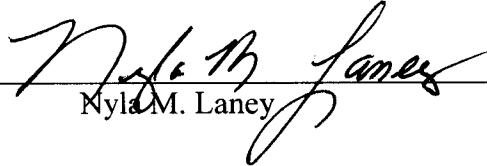
Marty Bocoock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street  
Suite 1050  
Columbia, South Carolina 29201  
**(Electronic Mail)**

Mr. Rohan Ranaraja  
Manager-State Governmental Affairs  
Alltel Telecommunications, Inc.  
1 Allied Drive  
Little Rock, Arkansas 72202  
**(Electronic Mail)**

Allen G. Buckalew  
J. W. Wilson & Associates  
1601 North Kent Street  
Suite 1104  
Arlington, VA 22209  
**(Electronic Mail)**

Ms. Melanie M. Lloyd  
7501 Callbraam Lane  
Austin, TX 78736  
(PSC Consultant)  
**(Electronic Mail)**

Ms. Lisa Sapper  
Docket Manager - AT&T  
1121 Chapel Hill Road  
Madison, WI 53711  
**(Electronic Mail)**

  
Nyla M. Laney

PC Docs # 512354